FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Sunnyside Corporation Attn: Henry E. Buchanan 225 Carpenter Avenue Wheeling, IL 60090

<u>Application No.</u>: 76060093 <u>I.D. No.</u>: 031324ABX

Applicant's Designation: 052088APC5 Date Received: August 30, 2004

Subject: Chemical Blending/Processing

Date Issued:
Expiration Date:

<u>Location</u>: 225 Carpenter Avenue, Wheeling

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 18 holding/blending tanks, nine fill lines including a truck loading/unloading station, eight natural gas fired combustion units, and 18 storage tanks pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1. This federally enforceable state operating permit (FESOP) is issued to limit the emissions of volatile organic material (VOM) and hazardous air pollutants (HAPs) from the facility to less than major source thresholds for each pollutant (25 tons/year for VOM and combined HAPs, and 10 tons/year for an individual HAP), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program Permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes the current permits issued for this location.
- Operation of the Chemical Blending and Processing facility shall not exceed the following limits:
 - a. Emission Source Group 1 All Material Handling

i.		VOM Emissions				
	<u>Activity</u>	(Gal/Mo)	(Gal/Yr)	(Ton/Mo)	(Ton/Yr)	
	Storage*	5,150,400	51,504,000	0.6	6	
	Blending**	3,746,400	37,464,000	0.84	8.4	
	Filling**	5,150,400	51,504,000	1.0	10.3	
	_			Total	24.7	

Storage limits are based on TANKS Computer Program in application. Blending and filling limits are based on the following equation for submerged loading only:

$$\text{VOM Emitted (Lbs)} = \frac{\text{Volume (Gals)}}{7.48 \text{ (Gal/cf)}} \times \frac{\text{Vapor Pressure (psi)}}{14.7 \text{ psi}} \times \frac{1 \text{ Mole}}{387 \text{ (cf)}} \times \frac{\text{MW (Lb)}}{\text{Mole}}$$

- Storage includes truck unloading; filling includes truck loading
- ** Blending and filling is based on submerged loading, no splash, of all chemicals
- ii. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP).

b. Emission Source Group 2 - Fuel Combustion Units

Natural Gas Usage: 5.5 mmcf/mo, 66 mmcf/yr

	E	М	I	S	S	I	0	N	S		
NC	CO				VOM						
(Tons/Mo)	(Tons/Yr)	()	Cons	/Mo)	(To	ons/	Yr)	()	Cons/M	(0)	(Tons/Yr)
0.33	3.3		0.3	3		2.8			0.02		0.2

These limits are based on standard AP-42 emission factors.

- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month and the preceding 11 months.
- 3a. This permit is issued based on the blending operations not being subject to the requirements of Subpart QQ of the 35 Ill. Adm. Code, Part 218. This is a consequence of the voluntarily requested limits of this federally enforceable state operating permit.
- b. This permit is issued based on the operation of all storage tanks and filling operations not being subject to the requirements of Subpart TT of the 35 Ill. Adm. Code Part 218. This is a consequence of the voluntarily requested production limits of this federally enforceable state operating permit.
- 4a. This permit is issued based on no odor nuisance and all vapor pressures being less than 2.5 psi, thereby exempting this source from 35 Ill. Adm. Code 218.122.
- b. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 5. The Permittee shall maintain monthly records of the following items:
 - a. Number of gallons of each material blended or filled (gal/mo and gal/yr);
 - b. Vapor pressure and molecular weight of each material blended or filled;
 - c. VOM and HAP emissions with supporting calculations using equation in Condition 2 for each material blended or filled (tons/mo and tons/yr);
 - d. For materials with vapor pressure greater than 0.1 psia, material stored in each storage tank and throughput of material (as supported by purchase records) of each storage tank and emission calculations (tons/mo and tons/yr); and
 - e. Natural gas consumption (million cubic feet/month and million cubic feet/year).
- 6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

- 7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency Division of Air Pollution Control Compliance Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276

<u>and</u> one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency Division of Air Pollution Control 9511 West Harrison Des Plaines, Illinois 60016

It should be noted that this permit has been revised to change the usage and emission limits in Condition 2 and to reflect the change in the number of storage tanks.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section Division of Air Pollution Control

DES:RBS:jar

cc: Region 1

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the chemical blending plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons/year for VOM and combined HAPs, and 10 tons/year for an individual HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

				HAPs Combined Single		
Emission Units	VOM	NO_x	CO			
	(Tons/Yr)	(Tons/Yr)	(Tons/Yr)	(Tons/Yr)	(Tons/Yr)	
Storage	6					
Blending	8.4					
Filling	10.3					
Natural Gas Units	0.2	3.3	2.8			
Totals:	24.9	3.3	2.8	< 25	< 10	

RBS:jar